

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

DARRYL GEORGE AND DARRESHA GEORGE,

Plaintiffs,

V.

C.A. No. 3:24-CV-00012

**GREG ABBOTT, KEN PAXTON,
BARBERS HILL INDEPENDENT
SCHOOL DISTRICT, GREG POOLE,
LANCE MURPHY AND RYAN
RODRIGUEZ**

Defendants.

**BARBERS HILL INDEPENDENT SCHOOL DISTRICT'S SUPPLEMENT TO
ITS RESPONSE AND SUGGESTION OF MOOTNESS TO PLAINTIFFS'
REQUEST FOR INJUNCTIVE RELIEF**

Barbers Hill Independent School District (the District) Supplements its Response to Plaintiff's Application for Temporary Restraining Order, Temporary Injunction, and Preliminary Injunction (Dkt. 84) and files its Suggestion of Mootness to Plaintiffs' Request for Injunctive Relief (Dkts. 81-82), as follows:

1. On August 14, 2024, Plaintiff filed his re-urged Application for injunctive relief, which he supplemented on August 15, 2024. Dkts. 81-82.
2. On August 20, 2024, the District responded in opposition. Dkt. 84.
3. On August 20, 2024, Plaintiff Darryl George executed a Withdrawal Form

and formally and officially withdrew from the District.¹

4. On August 21, 2024, the District's counsel notified Plaintiff's counsel of George's withdrawal via telephone correspondence.

5. As no action has been taken by Plaintiff's counsel, including withdrawal of Plaintiff's request for injunctive relief, the District supplements its response in opposition and suggests to the Court that Plaintiff's claim for injunctive relief is now moot as he does not attend school within the District and, therefore, lacks standing to request injunctive relief. *See, e.g., Pederson v. LSU*, 213 F.3d 858, 874 (5th Cir. 2000) ("As is so often the case in suits for injunctive relief brought by students, graduation or impending graduation renders their claims for injunctive relief moot.").

CONCLUSION

As Plaintiff is no longer a student of the District, this Court should deny Plaintiff's request for injunctive relief.

¹ Upon request of the Court, the District will provide a copy of George's Withdrawal Form, under seal, as the document is a student record and the Court has not entered a Protective Order in this case. *See* Dkts. 22, 34, 66.

Respectfully submitted,

ROGERS, MORRIS & GROVER, L.L.P.



JONATHAN G. BRUSH

Attorney-in-Charge

State Bar No. 24045576

Fed. I.D. No. 619970

jbrush@rmgllp.com

AMY DEMMLER

State Bar No. 24092337

Fed. I.D. No. 3227731

ademmler@rmgllp.com

RICHARD A. MORRIS

State Bar No. 14497750

Fed. I.D. 15004

rmorris@rmgllp.com

5718 Westheimer, Suite 1200

Houston, Texas 77057

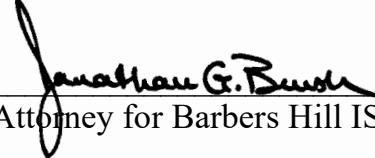
Telephone: 713/960-6000

Facsimile: 713/960-6025

ATTORNEYS FOR BARBERS HILL
INDEPENDENT SCHOOL DISTRICT

CERTIFICATE OF SERVICE

I hereby certify that on September 5, 2024, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send electronic notification of such filing to all counsel of record.



Attorney for Barbers Hill ISD